



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

July 9, 2015

Georgia Anastasiou  
Agent for Nisus Corporation  
Lewis & Harrison  
122 C Street, N.W. Suite 505  
Washington, DC 20001

Subject: Label Amendment – Add new Storage and Disposal, update Warranty  
Product Name: QNAP8 Copper Naphthenate  
EPA Registration Number: 64405-16  
Application Date: March 31, 2015  
Decision Number: 503103

Dear Ms. Anastasiou:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

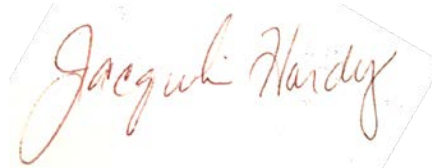
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Tom Luminello by phone at 703-308-8075, or via email at [Luminello.Tom@epa.gov](mailto:Luminello.Tom@epa.gov).

Sincerely,

A handwritten signature in red ink that reads "Jacqueline Hardy". The signature is written in a cursive style and is contained within a faint, light-colored rectangular border.

Jacqueline Hardy, Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

Enclosure: Stamped Label dated 7/9/2015

# QNAP8 COPPER NAPHTHENATE CONCENTRATE

Keep Out of Reach of Children  
**WARNING**  
See Label for additional Precautionary Statements.

**Active Ingredient:**

Copper Naphthenate (CAS No. 1338-02-9) ..... 68%\*  
 Other Ingredients ..... 32%  
 Total ..... 100%  
 Contains Petroleum Distillates                      \*Equivalent to 8% Metallic Copper.

Net Contents:  5.0 Gallon (18.93 Liters) Net Weight: 8.3 Pounds (3.76 Kilos)  
 [Net Contents:    55.0 Gallon (189.3 Liters)     275 Gallons (1040.99 Liters)     bulk tanker]

EPA Reg. No. 64405-16      EPA Est. \_\_\_\_\_  
 © \_\_\_\_\_ Made in the U.S.A.

**ACCEPTED**  
7/9/2015

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 64405-16

**First Aid**

If in Eyes	<ul style="list-style-type: none"> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> </ul>
If on Skin or Clothing	<ul style="list-style-type: none"> <li>Take off contaminated clothing.</li> <li>Immediately rinse skin with plenty of water for 15-20 minutes.</li> </ul>
If Swallowed	<ul style="list-style-type: none"> <li>Do not give person any liquids.</li> <li>Do not give anything by mouth to an unconscious person.</li> <li>Do not induce vomiting unless told to do so by a poison control center or doctor.</li> </ul>
If Inhaled	<ul style="list-style-type: none"> <li>Move person to fresh air.</li> <li>If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> </ul>
<p>Call a poison control center or doctor for further treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment. [You may also contact 1-800-424-9300 for emergency medical treatment information.]</p>	
<p><b>NOTE TO PHYSICIAN:</b> Probable mucosal damage may contraindicate the use of gastric lavage.</p>	

*{Note: The first aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.}*

## PRECAUTIONARY STATEMENTS Hazards to Humans & Domestic Animals

### WARNING

Causes skin and eye irritation. Prolonged or repeated skin contact may cause allergic reaction in some individuals. Harmful if swallowed or inhaled. Do not breathe vapors or mist during brush, roll, and dip applications. Do not get in eyes, on skin, or on clothing.

Wear chemical resistant gloves, protective eyewear, long-sleeved shirt, long pants, socks and shoes when handling or applying this product. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Application of this product may produce a strong, lingering, unpleasant odor.

### Personal Protective Equipment (PPE)

- Applicators, mixers and other handlers must wear chemical resistant gloves, protective eyewear, long-sleeved shirt, long pants, socks and shoes when handling or applying this product.
- When applying this product with a brush/roller, applicant must wear an organic vapor respirator.
- Some materials that are chemical-resistant to this product are barrier laminate; butyl, nitrile, neoprene and natural rubbers  $\geq 14$  mils; polyethylene; polyvinyl chloride; and viton  $\geq 14$  mils. If you want more options, follow the instructions for category C on an EPA chemical-resistance category selection chart.

### User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet;
- Remove clothing immediately if pesticide gets inside, then wash thoroughly and put on clean clothing;
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

### Environmental Hazards

This product is toxic to aquatic invertebrates, shrimp and oysters/clams. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your state water board or regional office of the EPA.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

#### Notice

Read and understand the entire label before using. Use only according to label directions.

Before buying or using this product, read *Warranty Disclaimer* and *Limitation of Remedies* statements found elsewhere on this label. If terms are unacceptable, return unopened package to seller for full refund of purchase price. Otherwise, use by the buyer or any other user constitutes acceptance of the terms under *Warranty Disclaimer* and *Limitation of Remedies*.

QNAP8 Copper Naphthenate Concentrate treated wood will [be protected from] [kill] [control] [prevent] [stop] infestation of destroying organisms including subterranean termites, drywood termites, wood destroying beetles, powderpost beetles, carpenter ants and decay [fungi]. QNAP8 Copper Naphthenate Concentrate [This product] may also be used to [protect] [kill] [control] [prevent] [stop] [resist] warping, swelling, shrinking, end checking [due to its antiwicking property, which resists moisture absorption and movement from end to end]] [caused by changes in moisture content of wood products], rot [wood rot], mold and mildew, and moss.

Solutions of QNAP8 Copper Naphthenate Concentrate [this product] can be applied to wooden [and] [or] [cellulose] utility and construction products (including lumber, end cuts, timber, rail ties, posts, poles, freeway fencing, siding, piers, docks, boxes, roofs, shakes, shingles, porches, steps, fences, rails and beverage cases). QNAP8 Copper Naphthenate Concentrate treated wood is suitable for ornamental or planting landscape timbers [ties], wooden seedling trays, outdoor décor, flower boxes and window boxes. [The treated wood can burned [for fuel] or [disposed of] re-purposed after primary service as a railroad tie, post, mulch or utility pole for use in residential landscaping or as fence posts.]

QNAP8 Copper Naphthenate Concentrate [This product] must be diluted with a solvent such as mineral spirits, diesel fuel, [fuel oil,] mineral oil or another solvent that meets American Wood Protection Association (AWPA) Standards. Effective application rates vary according to severity of conditions to which the treated product is exposed but for guidance see the American Wood Protection Book of Standards for the applicable use category or commodity.

Wood treated with QNAP8 Copper Naphthenate Concentrate [this product] must not be used where it will come in contact with food, feed or potable water. Do not use QNAP8 treated wood for garden applications where fruit and or vegetables will be grown. Wood treated with this product shall not be used in the construction of beehives. When field treating, do so in a manner that the product does not drip into sensitive environments. Whenever possible, apply field treatments prior to assembling the structure over the body of water or sensitive environment.

#### APPLICATION PROCEDURES:

Agitate well before using. Wood must be thoroughly seasoned. Allow at least 1 hour between [multiple] applications. Make certain all areas are fully treated to get the maximum benefits. If appropriate, see applicable AWPA treatment methods.

This product will tint the wood. The color will fade over time. If diluted with mineral spirits, the treated wood can be top-coated with paint or stain 24 hours after application. Always test the oil-based paint or stain in an inconspicuous area for color satisfaction.

#### DIP, ROLLER OR BRUSH

Above ground contact applications: QNAP8 Copper Naphthenate Concentrate solutions containing 1% or 2% copper metal are adequate for wood in non-critical applications. Mix a 1:3 or 1:4 dilution of QNAP8 Copper Naphthenate Concentrate [this product] and solvent to obtain 2% copper metal or 1:7 to 1:8 dilution of QNAP8 Copper Naphthenate Concentrate [this product] and solvent to obtain a 1% copper metal solution. Do not apply with an airless sprayer, by fine mist or by spray. Coverage is dependent upon application method and the refractory nature of the wood being treated; One gallon of diluted QNAP8 Copper Naphthenate Concentrate [this product] will cover approximately 100 - 300 sq. ft. of surface area.

**Ground contact applications:** Treat with a solution containing 0.75% to 2.0% copper metal to a retention in the wood of 0.03 [0.04] to 0.06 lbs copper metal/ ft<sup>3</sup> or in accordance with AWPA Standards. The application rate for wood treated with this product in a diptank shall not exceed 25% copper naphthenate.

#### END CUT TREATMENTS

To satisfy AWPA M4, apply a 1% or 2% dilution of QNAP8 Copper Naphthenate Concentrate [this product] to cuts, holes or injuries.

#### FOR PRESSURE TREATMENT

Treat with a solution containing 0.75% to 2.0% copper metal to a retention in the wood of 0.03 [0.04] to 0.13 lbs. copper metal/ ft<sup>3</sup> or in accordance with AWPA Standards.

#### REMEDIAL APPLICATIONS

A QNAP8 Copper Naphthenate Concentrate solution of 2% copper metal may be used for remedial treatment of standing wood poles, piling and other existing structures.

*{For product in rigid, refillable containers:}*

#### Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in original container in a preferably locked storage area inaccessible to children and pets. Do not freeze. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** Refillable container; refill this container only with QNAP8. Do not reuse this container for any other purpose. Cleaning the container before refilling is the responsibility of the refiller; cleaning before final disposal is the responsibility of the person disposing of the container. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with solvent, then vigorously agitate or recirculate with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure 2 more times, then offer for recycling, if available, or reconditioning, if appropriate; or puncture and dispose of in a sanitary landfill; or by incineration.

*{For product packaged in rigid, non-refillable containers less than or equal to 5 gallons:}*

#### Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in a cool, dry (preferably locked) storage area inaccessible to children and pets. Do not freeze. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** Nonrefillable container; do not reuse or refill this container. Triple rinse (or equivalent) container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with solvent and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times, then offer for recycling, if available; or reconditioning, if appropriate; or puncture and dispose of in a sanitary landfill; or by incineration.

*{For product packaged in rigid, non-refillable containers greater than 5 gallons:}*

### Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** Store in a cool, dry (preferably locked) storage area inaccessible to children and pets. Do not freeze. **Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. **Container Handling:** Nonrefillable container; do not reuse or refill this container. Triple rinse (or equivalent) container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with solvent. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling, if available; or reconditioning, if appropriate; or puncture and dispose of in a sanitary landfill; or by incineration.

*{Per PR Notice 2007-4 the batch code/lot number will appear on the label or container.}*

*{For the end-user's bulk tanks}*

**CONTAINER HANDLING:** Refillable container. Refill with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. Use standard industry practices for cleaning bulk containers or contact the registrant for more information.

**Spill or Leak Procedures:** Refer to the Material Safety Data Sheet (MSDS) associated with this product for information on how to properly clean-up spillage.

### Warranty Disclaimer

To the extent not prohibited by applicable law, Manufacturer warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. To the extent not prohibited by applicable law, **MANUFACTURER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.**

### Inherent Risks of Use

The directions for use of this product are believed to be adequate and must be carefully followed. It is impossible to eliminate all risks associated with use of this product. Lack of performance or other unintended consequences may result because of such factors as use of the product contrary to label instructions, abnormal conditions, the presence of other materials, climatic conditions or the manner of application, all of which are beyond the control of the Manufacturer. To the extent not prohibited by applicable law, the buyer/user assumes all such risks.

### Limitation of Remedies

To the extent not prohibited by applicable law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability or other legal theories) shall be limited to, at Manufacturer's election, one of the following:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used.

To the extent not prohibited by applicable law: a) Manufacturer shall not be liable for losses or damages resulting from handling or use of this product unless Manufacturer is promptly notified of such loss or damage in writing; and b) TO THE EXTENT NOT PROHIBITED BY APPLICABLE LAW, IN NO CASE SHALL MANUFACTURER BE LIABLE FOR CONSEQUENTIAL OR INCIDENTAL DAMAGES OR LOSSES, INCLUDING WITHOUT LIMIT, HEALTH RELATED DAMAGES OR INJURIES.

The terms of this Warranty Disclaimer and Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Manufacturer or the seller is authorized to vary or exceed the terms of this Warranty Disclaimer or Limitation of Remedies in any manner.

It is not intended that this product be used to practice any applicable patent, whether mentioned or not, without procurement of a license, if necessary, from the owner, following investigation by the user.



100 Nisus Drive  
Rockford, TN 37853  
[[Telephone Number]]

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Made in the U.S.A.

© \_\_\_\_\_  
{Label Code}

*{Marketing Claims}*

- [Non Restricted Use Wood] [Ground Contact] [Wood] Preservative
- General Use Pesticide
- Approved For Use On Wood With Ground Contact
- [Use] Above Or Below Ground [& Ground Contact]
- For Exterior And Ground Contact Use Only
- For Wood In Contact With Soil
- Preserves Wood
- Prolongs The Life Of Non-Pressure Treated Wood
- Meets AWWPA Standards M-4 [For End Cut Treatments] [for exterior field treatments] [for ground contact field treatments]
- Meets Or Exceeds AWWPA Standard \_\_\_\_\_ [P-36] [Specifications In \_\_\_\_\_ [U-1 and T-1]]
- [Ideal For] [Pressure-Treated Wood] End Cut Protection
- Brush on preservative especially formulated for the coating of freshly sawn ends of pressure treated Outdoor wood.
- For Use on *{insert application sites listed on label}*
- May Be Used In a Dual Treatment with Borates for Protection of Crossties, Switch Ties, Poles and Bridge Timbers [and *{insert application sites listed on label}*]
- For Preservation of Wood Against *{insert pests listed on label}*
- Prevents *{insert pests listed on label}*
- Protects Against Decay *{insert pests listed on label}*



- Resists mold and mildew
- Anti-wicking - controls moisture damage
- Stops *{insert pests listed on label}*
- Kills *{insert pests listed on label} {insert application sites listed on label}*
- Highly Effective Against *{insert pests listed on label}*
- Paintable and Stainable
- Deep Penetrating formula
- Note: application of product on redwood and cedar will darken wood.
- Made in USA
- Printed in USA
- Covers 100 - 300 sq. ft. (9-28m<sup>2</sup>) *{to be used on the 1 gallon container}*
- Covers 40 - 50 sq. ft. (4-5 m<sup>2</sup>) *{to be used on the 1 quart container}*
- Contains Copper Naphthenate
- 8% by Weight Metallic Copper
- Contains No Synthetic Carboxylic Acids [per AWWA Standard \_\_\_\_\_ [P-36]
- This product produced from 100% recycled Copper Metal and by-products from the refining industry
- Non Emulsion Forming
- Non Sludging
- Non Corrosive to Utility Hardware [Railroad Spikes and Tie Plates]
- Can Help Prevent "Spike Kill" when Combined with Borate Treatments
- Non Conductive
- Treated Wood Does Not Become Brittle or Hard
- Reduces Hardening of the Wood Which Allows for Increased [Easy] Gaff Penetration
- Provides Water Repellency
- Treated wood can be burned [for fuel][ disposed] [re-purposed] after primary service as a railroad tie [post] [utility pole] [for use in residential landscaping] [as fence posts].

[ ] Denotes alternate/optional language

{ } Denotes language that will not appear on market labeling